GIA Environmental Health and Safety Air Quality Management Standard

DOCUMENT IDENTIFIER: A-SP-ELMF767-00-0000 Rev A, 24-Dec-1991

ABSTRACT: This GIA standard defines the basic elements and responsibilities of a site Air Quality Management Program.

APPLICABILITY: This standard shall apply to GIA facilities and operations worldwide unless superseded by more stringent local regulations.

STATUS: APPROVED 24-Dec-1991; use VTX SMC for current status.

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1 INTRODUCTION

The purpose of this GIA standard is to define the basic elements and responsibilities of a site Air Quality Management Program.

1.1 SCOPE

This standard shall apply to GIA facilities and operations worldwide unless superseded by more stringent country and/or local regulations.

1.2 POLICY

Each site shall develop, document, and implement an Air Quality Management Program.

1.3 RESPONSIBILITIES

This subhead describes the responsibilities of the persons involved in fulfilling the requirements of this document.

- Site Manager

  Ensure the site or plant is in compliance with all applicable air quality regulations.

  Ensure that site Environmental Health and Safety (EH&S) is knowledgeable and sufficiently trained to implement this standard.

  Sign all reports required by regulatory agencies.

  Review and sign all permit applications.

  Consult on notification to regulatory agencies in the event of a violation.

  Hold employees accountable for their portions of this standard.

- Department Managers, Supervisors, Engineering and Facilities Staff

  Ensure that existing equipment, including air pollution control equipment and boilers, is properly maintained and balanced.

  Inform site EH&S well in advance of any planned change or addition to process equipment that could result in a change, positive or negative, to any air emissions.

  Inform site EH&S of any equipment malfunction or process excursion that could have resulted in the increased emission of regulated pollutants.

  Provide leadership in the development and implementation of new and innovative emissions abatement strategies to meet the goals of emission reduction.

- Operators and Employees

  Verify that existing equipment, including control equipment and boilers, is maintained.

Inform the supervisor of any equipment malfunction or process upset.

Assist in the development and implementation of new technologies to meet the goals of emission reduction.

Attend training, as required.

- Site Environmental Health and Safety (EH&S)

  Develop and implement the Air Quality Management Program.

  Interact, as necessary, with regulatory agencies.

  Acquire and maintain on-site up-to-date country and local air quality regulations.

  Be knowledgeable of the current and emerging requirements of applicable air quality or air emission regulations.

  Evaluate sources of air emissions to determine the level of permitting that is required.

  Annually review the status of air emission permits and ensure they are maintained.

  Assist manufacturing, engineering, and facilities personnel in the permitting and control requirements for new processes and facilities. Review all new processes at the design, capital approval request stage. Work with appropriate personnel, such as external consultants, engineers, and so forth, to be sure the design of new processes includes applicable air pollution control requirements.

  Verify any suspected violations in air quality or air emission regulations and notify and consult with all appropriate individuals, including the Plant Manager, the Law Department, and Area EH&S.

  Notify the regulatory agency of any verified violation, if appropriate. If possible, consult with management, Area EH&S, and the Law Department, prior to notification.

  Assist in the development and implementation of appropriate abatement strategies to meet the goals of emissions reduction.

  Conduct any required air toxic monitoring and/or air modeling to prepare permits and comply with reporting requirements.

  Maintain and track both projects that minimize air emissions and the annual cost of the Air Quality Management Program.

- Area Environmental Health and Safety (EH&S)

  Provide consultation and training, as required.

  Assist in the development and implementation of abatement strategies.

Assist in notification procedures in the event of a violation.

Review air quality regulatory reports, chemical profile analyses, and program costs.

Review capital approval requests for new air pollution control equipment and modifications to existing equipment.

1.4 LANGUAGE REQUIREMENT FOR THIS STANDARD

The details of this standard and all documentation associated with it, such as manuals, training materials, signs, labels, postings, and so forth, must be available in English and the accepted and official local language.

2 PROGRAM ELEMENTS

This segment describes the elements of the Air Quality Management Program that include regulatory compliance, inventory, tracking, monitoring, and reporting.

2.1 REGULATORY COMPLIANCE

A plan shall be in place and documented to maintain compliance with applicable local or country regulations at a minimum.

2.2 INVENTORY AND TRACKING

A plan shall be in place to inventory and track all regulated pollutants, as applicable, to the site emissions reduction strategy and country and/or local regulations.

2.3 MONITORING AND REPORTING

Each facility shall monitor its air emissions as required by regulatory authority.

Certified analytical results shall be used for all regulatory reporting requirements.

A file of all compliance reports shall be maintained at the site and copies sent to Area EH&S and the Law Department.

2.4 EMISSIONS REDUCTION AND WASTE MINIMIZATION

A waste minimization plan shall be developed, implemented, maintained, and documented to hold the process units responsible for new and existing processes to reduce emissions of regulated materials.

The plan shall require the use of nonregulated materials or materials with reduced toxicity.

The plan shall require implementation of in-line treatment, recycling, reclamation, and techniques to conserve resources.

The plan shall prohibit transferring pollutants from one medium to another, where possible, unless that transfer reduces the overall toxicity of the discharge.

Efforts to reduce the amount or toxicity of pollutants in the discharge shall be documented.

A mass balance report shall be generated annually.

The annual cost of the Air Quality Management Program shall be documented.

2.5 EQUIPMENT MAINTENANCE

A plan shall be in place to correctly operate and maintain all equipment that emits or controls the emission of regulated pollutants. Record keeping and supervisory approval requirements shall be included in the plan.

Process and control equipment shall be inspected, at least quarterly, to ensure its proper operation and maintenance. Ventilation systems must be properly balanced and monitored at least annually. Records of these activities shall be maintained.

Equipment specifications and up-to-date drawings, including drawings of the ventilation system and a roof plan with identified emission points, are to be kept on file.

All emission points shall be appropriately labeled.

Process flow and ducting diagrams shall be kept current.

2.6 EVALUATION OF PERMITTING REQUIREMENTS

The air quality permitting requirements of the facility shall be evaluated based on the:

Number and types of sources

Available emissions information

Equipment specifications (such as boilers, control equipment, and so forth)

Applicable regulations

Construction or modification of operations impacting air emissions shall not begin until all necessary permit approvals have been secured, or it is determined that a permit or permit modification is not required.

At a minimum, the air emissions from the facility must meet the requirements contained in the permit of the facility and any applicable regulations.

2.7 PERMIT MAINTENANCE

An evaluation of the permit status of the facility shall be performed annually and be based on changes in the:

Regulations

Process

Production rates

Permits must be maintained to ensure the permit is current, that all fees have been paid, and that files are maintained.

An inventory of all permits shall be maintained at the site or plant and updated annually. The permit inventory shall include identification of all point sources, major permit conditions, and restrictions.

2.8 PROCESS INSTALLATION OR MODIFICATION

An assessment of the regulatory impact must be made during the planning and design of any new facility or any modification of a facility or process that could trigger additional regulatory requirements.

The assessment must identify or confirm air emissions and evaluate them with respect to the regulations and any existing permit(s).

A compliance strategy shall be developed if the assessment indicates that the installation or modification would trigger new regulatory requirements.

A toxic use reduction strategy shall be part of all planning and design for process installations and modifications.

2.9 RESPONSE TO VIOLATIONS

Any suspected violations of an air permit condition or an air quality regulation must be immediately verified for accuracy by site EH&S.

Any substantiated violation must be reported to the Plant Manager, Area EH&S, and the Law Department as soon as verification is made.

In any noncompliance situation, the cause of the violation is to be identified and corrective action undertaken as soon as possible.

Verbal and written notification(s) to regulatory agencies shall be made, when appropriate, and within the required time frame after consultation with the Plant Manager, Area EH&S, and the Law Department. Document all verbal correspondence.

A documented investigative report shall be prepared and sent to Area EH&S, the Law Department, and the appropriate regulatory agencies, as required. All reports are to be retained on-site.

APPENDIX A RELATED DOCUMENTS

A.1 EL-Class Digital Documents

EL-Class Number	Document Title
EL-CP758-00	*Corporate Waste Management Policy—Principles of Waste Management*
EL-CP758-01	*Corporate Waste Management Policies—Process*
EL-CP758-02	*Corporate Waste Management Policy—Disposition and Reclamation of Inventory and Fixed Assets*

Use VTX SMC to order copies of EL-class documents from Standards and Methods Control. Send distribution questions to JOKUR::SMC or call DTN: 234-4423.

EL-CP758-00, EL-CP758-01, and EL-CP758-02 are also available through VTX WASTE. This document is available through VTX WASTE, or contact Corporate Waste Management at MSO2-1/11.

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